

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA)
)
VS.) CR. NO. 3:08-615
) COLUMBIA, SC
TIMOTHY MCQUEEN, TONY B) NOVEMBER 13, 2009
POUGH, JOSEPH B BRUNSON,)
)
DEFENDANTS.)
_____)

BEFORE THE HONORABLE MARGARET B. SEYMOUR
UNITED STATES DISTRICT COURT JUDGE
TESTIMONY OF SHEILA GIBSON

A P P E A R A N C E S:

FOR THE GOVERNMENT: WINSTON D HOLLIDAY, AUSA
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STENOTYPE-COMPUTER-AIDED TRANSCRIPTION

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SHEILA GIBSON

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SHEILA GIBSON, AFTER BEING SWORN, TESTIFIED AS
FOLLOWS:

DIRECT EXAMINATION

BY MR. HOLLIDAY:

Q GOOD AFTERNOON, MS. GIBSON.

A GOOD AFTERNOON.

Q I'M GOING TO ASK YOU TO SIT UP JUST A LITTLE BIT. I
KNOW YOU'RE SOFT SPOKEN, SO WE NEED TO MAKE SURE THE JURY CAN
HEAR YOU. WHERE DO YOU LIVE?

A 1315 KING STREET.

Q AND THAT'S HERE IN COLUMBIA; IS THAT RIGHT?

A YES, SIR.

Q AND YOU'RE A COLUMBIA NATIVE; IS THAT CORRECT?

A YES, I AM.

Q YOU WENT TO HIGH SCHOOL AT CA JOHNSON?

A YES.

Q WHEN DID YOU GRADUATE FROM CA JOHNSON?

A 1985.

Q OKAY. AND THEN YOU'VE HAD A LITTLE BIT OF COLLEGE HERE
IN TOWN AS WELL?

A YES.

1 Q WENT TO MIDLANDS TECH?

2 A YES, SIR.

3 Q OKAY. AND THE WORK THAT YOU HAVE DONE, TELL ME ABOUT --
4 WHAT'S THE LAST JOB THAT YOU HAD?

5 A TIME WARNER CABLE.

6 Q AND WHEN WERE YOU WITH TIME WARNER?

7 A JANUARY OF '08 THROUGH OCTOBER OF '09.

8 Q AND WHAT KIND OF JOB WERE YOU DOING WITH TIME WARNER?

9 A CUSTOMER SERVICE.

10 Q OKAY. AND THEN WAS THERE A POINT IN YOUR PROFESSIONAL
11 HISTORY WHEN YOU WORKED FOR CCG?

12 A YES, SIR.

13 Q DO YOU RECALL WHEN THAT WAS?

14 A AUGUST OF 2006.

15 Q AND THEN WHEN WAS IT THAT YOU LEFT?

16 A ABOUT AUGUST OR SEPTEMBER OF 2007.

17 Q AND WHILE YOU WERE WORKING AT CCG WHAT WAS YOUR SPECIFIC
18 JOB WHILE YOU WERE THERE?

19 A ADMINISTRATIVE ASSISTANT SLASH SUPERVISOR.

20 Q SO DID YOU RECEIVE A PROMOTION WHILE YOU WERE THERE --

21 A YES, SIR.

22 Q -- OR AN INCREASE IN YOUR RESPONSIBILITIES?

23 A YES, SIR.

24 Q OKAY. TELL ME WHEN YOU WERE AN ADMINISTRATIVE ASSISTANT
25 WHAT KIND OF THINGS YOU DID WHILE YOU WERE AT CCG DAY TO DAY.

1 A JUST ANSWERING THE PHONES.

2 Q OKAY. AND IF YOU COULD SPEAK UP JUST A LITTLE BIT MORE.
3 IT IS DIFFICULT TO HEAR YOU. AND THEN AT SOME POINT YOU WERE
4 PROMOTED TO BECOME A SUPERVISOR; IS THAT RIGHT?

5 A YES, SIR.

6 Q AND THEN WHEN YOU BECAME A SUPERVISOR WHAT KIND OF JOBS
7 DID YOU DO THERE?

8 A MAILING OUT CERTIFICATES, ANSWERING THE PHONE,
9 RESPONDING BACK TO E-MAIL, ORGANIZING FILES.

10 Q AND IF YOU WOULD TELL THE JURY A LITTLE -- WHEN YOU
11 FIRST STARTED WORK WITH CCG, WHERE WAS THE PHYSICAL LOCATION
12 AND WHAT KIND OF BUILDING WAS IT?

13 A PHYSICAL LOCATION WAS ON MONTICELLO ROAD. BRICK
14 BUILDING.

15 Q OKAY. AND AT SOME POINT DID THE OFFICES MOVE FROM THAT
16 LOCATION ON MONTICELLO ROAD?

17 A YES, SIR.

18 Q AND WHERE DID THEY GO AFTER THAT?

19 A A LOCATION IN THE NORTHEAST AREA.

20 Q WAS IT AN OFFICE OR WAS IT A HOUSE?

21 A IT WAS A HOUSE.

22 Q OKAY. AND THEN AT SOME POINT DID YOU LEAVE THE HOUSE
23 AND YOU MOVED INTO ANOTHER OFFICE BUILDING AFTER THAT?

24 A YES, SIR.

25 Q AND WHERE WAS THAT?

1 A ON HORSESHOE DRIVE.

2 Q OKAY. AND THEN WHEN--

3 THE COURT: ONE SECOND. CAN YOU PULL THAT -- I
4 CAN'T HEAR YOU. IF YOU COULD PULL THAT MICROPHONE AND SPEAK
5 INTO IT. THANK YOU.

6 MR. HOLLIDAY: THANK YOU, JUDGE.

7 BY MR. HOLLIDAY:

8 Q AND THEN WHEN YOU WERE A SUPERVISOR, DID YOU -- HOW MANY
9 FLOORS WERE IN THAT -- THE BUILDING WHERE YOU WERE WORKING?

10 A THREE.

11 Q AND WHAT FLOOR WERE YOU WORKING ON?

12 A ON THE THIRD FLOOR.

13 Q WHAT KIND OF ACTIVITY WENT ON ON THE THIRD FLOOR?

14 A THE FILE ROOM WAS ON THE THIRD FLOOR. WE MAILED OUT
15 CERTIFICATES, PRINTED CERTIFICATES FROM THE THIRD FLOOR,
16 E-MAIL CORRESPONDENCE. BASICALLY THAT WAS IT.

17 Q WHO WERE SOME OF THE OTHER PEOPLE WHO WORKED WITH YOU UP
18 THERE?

19 A JASSMINE, ASHLEY.

20 Q WHAT IS JASSMINE'S LAST NAME?

21 A WRIGHT.

22 Q OKAY. AND ASHLEY IS ASHLEY WHO?

23 A ASHLEY JOHNSON OR DAVIS. I'M NOT -- I'M NOT SURE.

24 Q OKAY.

25 A TWAN -- AND I'M NOT SURE WHAT HIS LAST NAME IS, MYSELF

1 AND LISA MCQUEEN.

2 Q AND IS LISA MCQUEEN RELATED TO TIM MCQUEEN?

3 A YES, SIR.

4 Q HOW IS THAT?

5 A IT'S HIS WIFE.

6 Q AND WHAT WAS HER JOB UP THERE?

7 A WELL, SHE WAS MY BOSS. SHE WAS OVER ME. AND SHE WAS
8 MAINLY RESPONSIBLE FOR TALKING TO REPS AS WELL AND FOR
9 PRINTING CHECKS.

10 Q NOW, YOU HAVE TESTIFIED THAT YOU WERE FAMILIAR WITH THE
11 CERTIFICATES AND MAIL GOING OUT, PRINTING OF CHECKS AND ALL
12 THAT. WHAT WAS YOUR UNDERSTANDING OF THE BUSINESS THAT THEY
13 WERE RUNNING?

14 A MY UNDERSTANDING OF THE BUSINESS IS THAT IT WAS A
15 BUSINESS TO HELP PEOPLE PAY THEIR DEBTS OFF, TO GET THEM OUT
16 OF BONDAGE.

17 Q AND WERE YOU FAMILIAR WITH THOSE SPECIFIC PROGRAMS THAT
18 THEY OFFERED?

19 A YES, SIR.

20 Q AND WHAT ARE SOME OF THOSE PROGRAMS?

21 A CHRISTMAS CLUB, CREDIT CARD, MORTGAGE, FUTURE MORTGAGE,
22 AUTO, FUTURE AUTO.

23 Q AND WHEN SOMEBODY PARTICIPATED IN PROGRAMS LIKE THAT,
24 DID THEY RECEIVE CERTIFICATES MEMORIALIZING THAT FACT?

25 A YES, SIR.

1 Q AND WERE THOSE CERTIFICATES SIGNED?

2 A YES, SIR.

3 Q AND WHO WOULD BE DOING THE SIGNING? WHOSE NAMES ARE
4 DOWN ON THE BOTTOM?

5 A MR. MCQUEEN OR MR. POUGH.

6 Q AND DID YOU EVER PARTICIPATE IN ANY OF THESE PROGRAMS?

7 A YES.

8 Q WHICH ONES DID YOU PARTICIPATE IN?

9 A CHRISTMAS CLUB, MORTGAGE, AND A FUTURE MORTGAGE.

10 Q DID YOU -- DID YOU HAPPEN TO ATTEND ANY OF THE
11 PRESENTATIONS PUT ON BY THE THREE HEBREW BOYS?

12 A YES, SIR.

13 Q HOW MANY DO YOU -- DID YOU ATTEND?

14 A TWO.

15 Q AND WHO PRESENTED AT THE PRESENTATIONS YOU ATTENDED?

16 A TIM MCQUEEN AND TONY POUGH.

17 Q AND WAS THAT FOR BOTH OF THE PRESENTATIONS YOU ATTENDED?

18 A TIM PRESENTED AT BOTH AND I BELIEVE TONY ONLY SPOKE A
19 FEW MINUTES AT ONE.

20 Q NOW MA'AM, I'M GOING TO RUN THROUGH SOME DOCUMENTS WITH
21 YOU FROM CCG; OKAY?

22 MR. HOLLIDAY: AND YOUR HONOR, THESE ARE GOING TO
23 BE EXHIBITS 80 THROUGH 96 AND THERE ARE SUBLETTERS WITHIN
24 THOSE, BUT I WILL BE IDENTIFYING THOSE. I KNOW THEY ARE NOT
25 ON YOUR LIST.

1 BY MR. HOLLIDAY:

2 Q STARTING YOU OFF WITH EXHIBIT 80. I'M SHOWING YOU WHAT
3 HAS BEEN MARKED AS EXHIBIT 80C. WITHOUT--

4 THE COURT: YOU'RE JUST SHOWING HER THESE FOR
5 IDENTIFICATION PURPOSES?

6 MR. HOLLIDAY: THAT'S EXACTLY CORRECT, YOUR HONOR.
7 I HAVE -- DEFENSE COUNSEL HAD AN OPPORTUNITY TO REVIEW IT.
8 MAYBE WE'LL -- THIS GO A LITTLE QUICKER AFTER WE HAVE DONE A
9 FEW.

10 BY MR. HOLLIDAY:

11 Q SO YOU SEE THE LOGO UP TOP WITHOUT TELLING ME WHAT IT
12 IS?

13 A YES, SIR.

14 Q DO YOU RECOGNIZE THE SIGNATURE DOWN AT THE BOTTOM?

15 A YES.

16 MR. HOLLIDAY: YOUR HONOR, AT THIS TIME WE MOVE TO
17 ADMIT GOVERNMENT'S EXHIBIT 80C AND PUBLISH IT TO THE JURY.

18 THE COURT: ANY OBJECTION?

19 MR. LANG: I'M SORRY. WHICH NUMBER WAS THAT, YOUR
20 HONOR?

21 THE COURT: 80C.

22 MR. HOLLIDAY: 80C.

23 MR. LANG: NO OBJECTION, YOUR HONOR.

24 THE COURT: IT'S ADMITTED.

25 BY MR. HOLLIDAY:

1 Q YOU SEE UP TOP THERE THE LOGO WITH THE CAPITAL
2 CONSORTIUM GROUP; IS THAT RIGHT?

3 A YES, SIR.

4 Q AND IT'S MADE OUT TO ANNIE SMALL; IS THAT RIGHT?

5 A YES.

6 Q SHE'S IN FAYETTEVILLE, NORTH CAROLINA?

7 A UH-HUH.

8 Q YOU RECOGNIZE THE SIGNATURE DOWN AT THE BOTTOM?

9 A YES, SIR.

10 Q AND WHO IS IT FOR? WHO SIGNED IT?

11 A TONY POUGH.

12 Q AND THEN IT'S A MORTGAGE SATISFACTION PROGRAM; IS THAT
13 CORRECT?

14 A YES, SIR.

15 Q NOW MOVING ON TO 80B. DO YOU RECOGNIZE WHAT I'M SHOWING
16 YOU THERE?

17 A YES.

18 Q DO YOU RECOGNIZE THE SHIPPING LABEL THERE?

19 A YES, I DO.

20 MR. HOLLIDAY: YOUR HONOR, AT THIS TIME THE
21 GOVERNMENT WOULD MOVE TO ADMIT EXHIBIT 80B.

22 MR. DUNCAN: NO OBJECTION.

23 THE COURT: ADMITTED.

24 BY MR. HOLLIDAY:

25 Q LOOKING AT THAT, THAT'S -- IS THIS KMF MAILING LABEL A

1 LABEL SIMILAR TO THOSE THAT YOU AFFIX TO ENVELOPES AND SO
2 FORTH?

3 A YES, SIR.

4 Q AND THAT WAS ON BEHALF OF CCG; IS THAT CORRECT?

5 A YES.

6 Q AND THE 1013 BROAD RIVER ROAD, SUITE 275, COLUMBIA,
7 SOUTH CAROLINA, IS THAT AN ADDRESS THAT YOU'RE FAMILIAR WITH?

8 A IT'S A ADDRESS THAT WAS ON THE LABEL, BUT I HAVE NEVER
9 PHYSICALLY BEEN TO THE ADDRESS, BUT YES.

10 Q OKAY. WELL, LET ME -- GOING BACK TO GOVERNMENT'S
11 EXHIBIT 80C, IF YOU LOOK DOWN HERE, THE ANNOTATION THAT SAYS,
12 MAILING ADDRESS. YOU SEE THERE?

13 A YES, SIR.

14 Q AND YOU SEE IT SAYS 1013 BROAD RIVER ROAD, SUITE 275,
15 COLUMBIA, SOUTH CAROLINA?

16 A YES.

17 Q 29210. SO THEN IF WE GO BACK TO 80B YOU SEE THAT'S THE
18 SAME ADDRESS?

19 A THAT'S CORRECT.

20 Q AND THAT'S BEING SENT TO ANNIE SMALL; IS THAT RIGHT?

21 A YES, SIR.

22 Q SHOWING YOU NOW WHAT'S THE BEEN MARKED AS GOVERNMENT'S
23 EXHIBIT 80E. YOU SEE THE LOGO UP FRONT -- UP TOP?

24 A YES, SIR.

25 Q YOU RECOGNIZE THE SIGNATURE AT THE BOTTOM?

1 A YES.

2 MR. HOLLIDAY: YOUR HONOR, AT THIS TIME THE
3 GOVERNMENT WOULD MOVE TO ADMIT GOVERNMENT'S EXHIBIT 80E.

4 MR. LANG: NO OBJECTION, YOUR HONOR.

5 THE COURT: ADMITTED.

6 BY MR. HOLLIDAY:

7 Q MA'AM, YOU SEE THIS AS ANOTHER -- THIS IS A MAILING TO
8 ANNIE SMALL; IS THAT CORRECT?

9 A YES, IT IS.

10 Q FOR THE CREDIT CARD SATISFACTION PROGRAM; IS THAT RIGHT?

11 A THAT'S CORRECT.

12 Q AND THEN THE SIGNATURE DOWN THE BOTTOM, DO YOU RECOGNIZE
13 THAT?

14 A YES, SIR.

15 Q WHOSE SIGNATURE IS THAT?

16 A TIM MCQUEEN.

17 Q OKAY. SHOWING YOU WHAT'S BEEN MARKED AS EXHIBIT 80D
18 WITHOUT TELLING THE JURY, WHAT'S THE -- DO YOU RECOGNIZE THE
19 MAILING LABEL THERE?

20 A YES, SIR.

21 Q OKAY.

22 MR. HOLLIDAY: GOVERNMENT WOULD MOVE TO ADMIT
23 GOVERNMENT'S EXHIBIT 80D.

24 MR. DUNCAN: NO OBJECTION.

25 THE COURT: IT'S ADMITTED.

1 (MR. HOLLIDAY CONFERRING WITH DEFENSE COUNSEL.)

2 MR. DUNCAN: WE DIDN'T OBJECT. CAN WE APPROACH
3 JUST A MINUTE?

4 (WHEREUPON, COUNSEL APPROACHED THE BENCH.)

5 MR. HOLLIDAY: WE DON'T HAVE TO GO THROUGH THE STEP
6 OF, THEY CAN'T SEE THEM AND THEN THEY DO. JUST PUT THEM UP.
7 BECAUSE YOU REVIEWED THEM ALL OVER LUNCH.

8 MR. LANG: YES. WHAT WE'RE GOING THROUGH NOW IS
9 ALL THE -- AS I UNDERSTAND IT -- THE PEOPLE WHO AREN'T COMING
10 BUT ARE NAMED IN THE INDICTMENT.

11 MR. HOLLIDAY: THAT'S RIGHT.

12 MR. LANG: EITHER SUBSEQUENT COUNTS OR -- IT'S A
13 COMBINATION OF ALL THREE. AND THIS POINT IS -- BE SUFFICIENT
14 FOR THE GOVERNMENT TO GET BY A MOTION FOR JUDGMENT OF
15 ACQUITTAL. AND ALL THESE THINGS I THINK ARE CLEARLY
16 ADMISSIBLE UNDER -- THEY CAN LAY THE FOUNDATION FOR THEM.

17 MR. HOLLIDAY: CERTIFICATES AND ENVELOPES AND
18 MAILING LABELS AND THAT KIND OF THING.

19 MR. LANG: SHOW THAT THEY WENT OUT FROM THE CCG
20 OFFICES.

21 MR. HOLLIDAY: YEAH.

22 MR. LANG: THE BANK RECORDS ARE ALREADY IN
23 EVIDENCE. I MEAN, THESE ARE JUST EXCERPTS OF BANK RECORDS.

24 THE COURT: SO WHAT ARE YOU SAYING? CAN'T YOU JUST
25 SHOW THEM TO HER AND ASK HER TO LOOK AT THEM SEE IF SHE

1 RECOGNIZES THEM?

2 MR. HOLLIDAY: WELL, I'M TRYING TO -- IT'S A LOT OF
3 COUNTS. THERE ARE A LOT OF THEM. THEY ARE TOGETHER WITH THE
4 EXCERPTS FROM THE THUMB DRIVE AND THE BANK RECORDS, SO
5 IT'S -- THOSE ARE THE THINGS THAT WE PLAN TO PUT IN FOR EACH
6 COUNT. SO WE COULD JUST SAY MOVE THEM IN EN MASSE AND THEN I
7 CAN PULL THOSE DOCUMENTS OUT AND PUT THEM UP HERE OR I CAN
8 WALK THEM THROUGH AND JUST SAY, OKAY--

9 THE COURT: HOW MANY DO YOU HAVE?

10 MR. HOLLIDAY: IT'S 16 DIFFERENT FOLDERS AND THERE
11 ARE MULTIPLE ONES IN EACH ONE.

12 THE COURT: WELL, CAN YOU JUST SHOW THEM TO HER AND
13 ASK HER IF SHE RECOGNIZES THEM, WHETHER YOU ALL WOULD AGREE
14 THAT THEY ARE ADMISSIBLE SO HE DOESN'T HAVE TO GO THROUGH THE
15 WHOLE PROCESS OF NOT SHOWING TO THE JURY THEN SHOWING TO THE
16 JURY THEN FINDING OUT WHETHER YOU OBJECT AND...

17 MR. SMALL: JUDGE, CAN YOU JUST GIVE US ONE MINUTE?

18 (DEFENSE COUNSEL CONFERRING.)

19 MR. SMALL: JUDGE, I WILL EXPRESS MY CONCERN IF
20 IT'S NOT A SECRET, BUT WHAT CONCERNS ME IS THIS. THERE ARE
21 GOING TO BE SOME SO-CALLED VICTIMS THAT AREN'T GOING TO BE
22 HERE AND THAT'S THE STACK THAT WE ARE TALKING ABOUT RIGHT
23 NOW. NOW, JUST BECAUSE SOMETHING IS A BUSINESS RECORD
24 DOESN'T MEAN THAT EVERYTHING THAT COMES IN FOR THE TRUTH OF
25 THE MATTER ASSERTED. THAT'S LIKE A POLICE REPORT. THERE ARE

1 CERTAIN THINGS IN THERE THAT DON'T COME IN FOR THE TRUTH.

2 YOU HAVE TO HAVE THE WITNESS.

3 AND WHAT -- I DON'T WANT TO SLOW DOWN THE PROCESS, BUT I
4 ALSO DO NOT WANT TO WAIVE ANY OBJECTION I HAVE TO THAT ISSUE
5 THAT WHICH IS NOT PART OF THE BUSINESS RECORD THAT I WOULD BE
6 SAYING, WELL, I AGREE THAT THAT'S WHAT THE VICTIM SAID.

7 THE COURT: OKAY. DO YOU HAVE ANY OBJECTION TO
8 SAYING THAT THEY ARE ALL ADMISSIBLE AND HE CAN JUST ASK HER
9 ABOUT THE DOCUMENTS WITHOUT GOING THROUGH THE BACK AND FORTH
10 WITH THE SCREEN?

11 MR. SMALL: RIGHT. I MEAN, THE PROCESS, BECAUSE
12 YES, SHE DOESN'T KNOW ANYTHING ABOUT THE RECORDS OTHER THAN--

13 MR. HOLLIDAY: RIGHT. SHE'S AN--

14 THE COURT: SAY YOU'RE AGREEMENT WITH DOCUMENTS 80
15 WHATEVER THROUGH --

16 MR. HOLLIDAY: TO 96.

17 THE COURT: -- ARE ADMISSIBLE. THEN YOU CAN JUST
18 SAY, DO YOU RECOGNIZE THIS. THEN WE DON'T HAVE TO NOT--

19 MR. SMALL: I AGREE WITH THAT.

20 MR. HOLLIDAY: THAT WOULD BE GREAT.

21 MR. SMALL: BUT I DON'T WAIVE ANY HEARSAY THAT
22 MIGHT BE WITHIN THE BUSINESS RECORD IF I -- IF I HAVE ANY
23 GROUNDS.

24 THE COURT: OKAY.

25 MR. SMALL: I JUST WANT TO BE SURE I'M PROTECTING

1 THAT PART OF IT.

2 THE COURT: BUT YOU WOULDN'T BE DOING THAT BY JUST
3 SAYING THE DOCUMENTS ARE--

4 MR. SMALL: EXACTLY. EXACTLY. AS LONG AS WE HAVE
5 THAT UNDERSTANDING, THAT'S NOT A PROBLEM.

6 THE COURT: I THINK IT WOULD SPEED IT UP IF WE
7 DON'T HAVE TO GO BACK AND FORTH.

8 MR. SMALL: I AGREE.

9 THE COURT: ALL RIGHT. LET'S DO THAT THEN.

10 MR. DUNCAN: ALSO, YOUR HONOR, ALL THREE OF US. I
11 GUESS WE SAID THAT AT THE BEGINNING OF THE TRIAL, BUT...

12 (WHEREUPON, COUNSEL STEPPED AWAY FROM THE BENCH.)

13 MR. HOLLIDAY: YOUR HONOR, JUST FOR PURPOSES OF THE
14 RECORD WE HAVE AGREED THAT THESE DOCUMENTS ARE ADMISSIBLE
15 WITH MR. SMALL'S CAVEAT AS FAR AS ANY HEARSAY OBJECTIONS, BUT
16 THEN WE'RE JUST GOING TO MOVE THROUGH AND HAVE THE WITNESS
17 IDENTIFY THEM.

18 THE COURT: SO IT'S DOCUMENTS -- GIVE ME THE
19 NUMBERS THEN.

20 MR. HOLLIDAY: WELL, THEY ARE -- THE EXHIBITS ARE
21 80 THROUGH 96, BUT THERE ARE SUB-LETTERS WITHIN THOSE --

22 THE COURT: OKAY.

23 MR. HOLLIDAY: -- THAT I'M MOVING TO ADMIT. AND WE
24 ARE ON 80D NOW, YOUR HONOR.

25 BY MR. HOLLIDAY:

1 Q AND MS. GIBSON, YOU HAVE IDENTIFIED THIS AS A MAILING
2 LABEL THAT LEFT FROM KMF; IS THAT CORRECT?

3 A YES.

4 Q AND IT WAS GOING ANNIE SMALL; IS THAT CORRECT?

5 A YES.

6 Q EXHIBIT 80G THEN IS A CAPITAL CONSORTIUM GROUP DOCUMENT.
7 DO YOU RECOGNIZE THE SIGNATURE DOWN AT THE BOTTOM?

8 A YES.

9 Q THIS ONE IS ALSO GOING TO ANNIE SMALL; IS THAT CORRECT?

10 A THAT'S CORRECT.

11 Q AND IT FOR THE CCG LONG-TERM PROGRAM; IS THAT CORRECT?

12 A YES, SIR.

13 Q WITH A DEPOSIT AMOUNT OF \$6000 THERE IN THE MIDDLE OF
14 THE PAGE?

15 A YES.

16 Q THEN 80F AGAIN IS A CCG MAILING LABEL WITH KMF ON IT; IS
17 THAT CORRECT?

18 A YES, SIR.

19 Q BEING SENT TO ANNIE SMALL, FAYETTEVILLE, NORTH CAROLINA;
20 IS THAT CORRECT?

21 A YES.

22 MR. HOLLIDAY: YOUR HONOR, MOVING ON TO
23 GOVERNMENT'S EXHIBIT 81.

24 BY MR. HOLLIDAY:

25 Q SHOWING YOU 81H, A CAPITAL CONSORTIUM GROUP CERTIFICATE.

1 DO YOU SEE THAT?

2 A YES.

3 Q IT'S ON BEHALF OF PAUL KENT. DO YOU SEE THERE?

4 A YES, SIR.

5 Q IT'S A CCG LONG-TERM PROGRAM CERTIFICATE \$30,000. DO

6 YOU SEE THAT?

7 A YES.

8 Q DO YOU RECOGNIZE THE SIGNATURE AT THE BOTTOM?

9 A YES, SIR.

10 Q AND WHOSE IS IT?

11 A TIMOTHY MCQUEEN.

12 MR. HOLLIDAY: YOUR HONOR, 81I.

13 BY MR. HOLLIDAY:

14 Q CAPITAL CONSORTIUM GROUP CERTIFICATE IN THE NAME OF

15 YOLANDA KENT. DO YOU SEE THAT, MS. GIBSON?

16 A YES.

17 Q IT'S FOR THE SHORT-TERM PROGRAM. THEN \$7500 IS BEING

18 CONTRIBUTED; IS THAT CORRECT?

19 A YES.

20 Q AND THEN YOU SEE THE SIGNATURE DOWN AT THE BOTTOM THERE?

21 A YES, SIR.

22 Q WHOSE IS IT?

23 A TIMOTHY MCQUEEN.

24 Q SHOWING YOU NOW 81J. SEE THE LOGO AT THE TOP?

25 A YES, SIR.

1 Q CAPITAL CONSORTIUM GROUP LOGO?

2 A YES.

3 Q THIS IS IN THE NAME OF YOLANDA KENT. IT'S FOR A
4 SIGNATURE AND STUDENT LOAN; IS THAT CORRECT?

5 A YES, SIR.

6 Q WITH A PAY-OFF OF \$21,387.11; IS THAT CORRECT?

7 A THAT'S CORRECT.

8 Q SIGNATURE AT THE BOTTOM IS WHOSE?

9 A TIMOTHY MCQUEEN.

10 Q SHOWING YOU 81K, CAPITAL CONSORTIUM GROUP LOGO AT THE
11 TOP. IT'S FOR THE BENEFIT OF PAUL KENT AND YULONDA KENT.
12 YOU SEE THAT THERE?

13 A YES.

14 Q MORTGAGE SATISFACTION PROGRAM; IS THAT CORRECT?

15 A YES.

16 Q PAY-OFF IS FOR \$311,372.67.

17 A YES.

18 Q AND THE SIGNATURE DOWN AT THE BOTTOM, YOU RECOGNIZE
19 THAT?

20 A YES, SIR.

21 Q WHOSE IS IT?

22 A TIMOTHY MCQUEEN.

23 Q I'M SORRY. I DIDN'T MEAN TO COVER IT.

24 A TIM MCQUEEN.

25 Q YES, MA'AM. SHOWING YOU GOVERNMENT'S EXHIBIT 81E.

1 APPEARS TO BE A SHIPPING ORDER. DO YOU SEE THE ADDRESS OR

2 CAN YOU MAKE OUT THE ADDRESS IN BLOCK A?

3 A YES.

4 Q AND WHAT IS IT?

5 A 1013 BROAD RIVER ROAD.

6 Q AND YOU SEE ABOVE THAT IT SAYS CAPITAL CONSORTIUM GROUP;

7 IS THAT CORRECT?

8 A YES, SIR.

9 Q AND THAT 1013 BROAD RIVER ROAD, SUITE 275 ADDRESS, THAT

10 IS A MAILING ADDRESS FOR THE CAPITAL CONSORTIUM GROUP; IS

11 THAT CORRECT?

12 A YES, SIR.

13 Q THEN SHOWING YOU HERE A SHIPPING RECEIPT FROM OFFICE

14 MAX. IT'S 81G. DO YOU SEE HERE THE SHIP TO ADDRESS?

15 A YES.

16 Q IS TO CAPITAL CONSORTIUM? YOU SEE THAT?

17 A YES, SIR.

18 Q AND THEN IT'S THE MAILING ADDRESS ON BROAD RIVER ROAD;

19 IS THAT CORRECT?

20 A YES, SIR.

21 Q GOVERNMENT'S EXHIBIT 82E. SEE THE CAPITAL CONSORTIUM

22 GROUP LOGO AT THE TOP THERE?

23 A YES.

24 Q IT'S MADE FOR THE BENEFIT OF CHERYL FISHER PARTICIPATING

25 IN THE SHORT-TERM PROGRAM. SHE'S CONTRIBUTING \$7500. AND

1 THE TOTAL PAY-OUT IS 15,000. AND DO YOU RECOGNIZE THE
2 SIGNATURE THERE?

3 A YES, SIR.

4 Q WHOSE IS IT?

5 A TIMOTHY MCQUEEN.

6 Q AGAIN THAT'S EXHIBIT 82E. THEN YOU RECOGNIZE THAT
7 MAILING LABEL?

8 A YES, SIR.

9 Q THAT'S ALSO ONE MADE ON BEHALF OF CCG; IS THAT CORRECT?

10 A YES, SIR.

11 Q AND SEE THIS POSTAGE UP HERE?

12 A YES.

13 Q AND THAT'S EXHIBIT 82D. MOVING NOW TO GOVERNMENT'S
14 EXHIBIT 83. SHOWING YOU 83D. SEE THE CAPITAL CONSORTIUM
15 GROUP LOGO AT THE TOP, THAT IT'S MADE OUT TO LOVIA BLACK AND
16 THOMAS BLACK FOR THE MORTGAGE SATISFACTION PROGRAM. THE
17 VALUE OF THE MORTGAGE IS \$213,746.13. AND DO YOU RECOGNIZE
18 THE SIGNATURE THERE?

19 A YES, SIR.

20 Q WHOSE IS IT?

21 A TIMOTHY MCQUEEN.

22 Q SHOWING YOU WHAT'S BEEN MARKED AS GOVERNMENT'S
23 EXHIBIT 83E. YOU SEE THE CAPITAL CONSORTIUM GROUP LOGO AT
24 THE TOP. IT'S MADE FOR THE BENEFIT OF THOMAS BLACK WHO IS
25 PARTICIPATING IN THE CCG LONG-TERM PROGRAM. THE RESIDUAL IS

1 A THOUSAND MONTHLY ON \$10,000 DEPOSIT. DO YOU RECOGNIZE THE
2 SIGNATURE ON GOVERNMENT'S EXHIBIT 83E?

3 A YES, SIR.

4 Q WHOSE IS IT?

5 A TIMOTHY MCQUEEN.

6 Q SHOWING YOU NOW WHAT'S BEEN MARKED AS GOVERNMENT'S
7 EXHIBIT 83F. IT'S A CAPITAL CONSORTIUM GROUP CERTIFICATE TO
8 THE BENEFIT OF THOMAS BLACK IN THE AUTO SATISFACTION PROGRAM
9 WITH A SCHEDULE PAY-OFF OF JUNE -- IN JUNE OF 2008. THE
10 BALANCE ON THE CAR IS \$37,741.87. IT'S FOR A 2007 CHEVY
11 AVALANCHE. AND YOU SEE THE SIGNATURE THERE?

12 A YES, SIR.

13 Q WHOSE SIGNATURE IS IT?

14 A TIMOTHY MCQUEEN.

15 Q AND THEN HERE, DO YOU RECOGNIZE THE SHIPPING LABEL ON
16 GOVERNMENT'S EXHIBIT 83C?

17 A YES, SIR.

18 Q AND IT'S BEING SENT TO THOMAS BLACK?

19 A YES.

20 Q AND THAT'S -- KMF IS AN ENTITY CONTROLLED BY CCG OR AT
21 LEAST THEY MAIL THINGS OUT BY THE NAME OF KMF; IS THAT
22 CORRECT?

23 A THAT'S CORRECT.

24 Q SHOWING YOU NOW WHAT'S BEEN MARKED AS GOVERNMENT'S
25 EXHIBIT 84C. YOU SEE CAPITAL CONSORTIUM GROUP AT THE TOP.

1 IT'S SENT TO REGINALD JOHNSON FOR THE CCG LONG-TERM PROGRAM.
2 HE'S CONTRIBUTED \$50,000 TO RECEIVE A \$5,000 MONTHLY PAYMENT.
3 YOU SEE THE SIGNATURE AT THE BOTTOM?

4 A YES, SIR.

5 Q WHOSE IS IT?

6 A TIMOTHY MCQUEEN.

7 Q SHOWING YOU NOW WHAT'S BEEN MARKED AS GOVERNMENT'S
8 EXHIBIT 85F. SENT BY THE CAPITAL CONSORTIUM GROUP TO DARLA
9 WILLIAMITIS IN FAYETTEVILLE, NORTH CAROLINA. SHE'S
10 PARTICIPATING IN THE CCG SHORT-TERM PROGRAM. THE DEPOSIT
11 AMOUNT IS \$500 WITH A 10 PERCENT RESIDUAL OF \$50. WHO IS
12 THAT SIGNED BY?

13 A TIMOTHY MCQUEEN.

14 Q SHOWING YOU NOW WHAT'S MARKED AS GOVERNMENT'S
15 EXHIBIT 85G AGAIN MADE TO MRS. WILLIAMITIS FOR THE AUTO
16 SATISFACTION PROGRAM. AND WHO IS THAT SIGNED BY?

17 A TIMOTHY MCQUEEN.

18 Q IT'S FOR A 2002 FOUR-DOOR LEXUS. YOU SEE THAT IN THE
19 MIDDLE THERE?

20 A YES, SIR.

21 Q SHOWING YOU GOVERNMENT'S EXHIBIT 85E. THAT'S THE
22 SHIPPING LABEL YOU'RE FAMILIAR WITH; IS THAT RIGHT?

23 A YES, SIR.

24 Q SENT TO MRS. WILLIAMITIS. AND YOU SEE THE POSTAGE AT
25 THE TOP?

1 A YES.

2 Q SHOWING YOU NOW WHAT'S BEEN MARKED AS GOVERNMENT'S
3 EXHIBIT 85C ANOTHER ONE TO MRS. WILLIAMITIS. IT'S A
4 SIGNATURE AND STUDENT LOAN PROGRAM. SHE'S SEEKING TO HAVE
5 \$40,436.73 PAID OFF. AND YOU SEE THE SIGNATURE THERE?

6 A YES, SIR.

7 Q WHOSE IS IT?

8 A TIMOTHY MCQUEEN.

9 Q NOW SHOWING YOU GOVERNMENT'S EXHIBIT 85D, CAPITAL
10 CONSORTIUM GROUP CERTIFICATE AGAIN TO MRS. WILLIAMITIS FOR A
11 MORTGAGE SATISFACTION OF A \$137,605.45. DO YOU RECOGNIZE THE
12 SIGNATURE?

13 A YES, SIR.

14 Q AND WHOSE IS IT?

15 A TIMOTHY MCQUEEN.

16 Q NOW SHOWING YOU A MAILING LABEL WITH KMF AFFIXED, AND
17 THAT'S BEING SENT TO DARLA L WILLIAMITIS. DO YOU RECOGNIZE
18 THE DOCUMENT AND THE POSTAGE UP TOP?

19 A YES, SIR.

20 Q THAT'S GOVERNMENT'S EXHIBIT 85B. SHOWING YOU WHAT'S
21 BEEN MARKED AS GOVERNMENT'S EXHIBIT 86E. IT'S A CAPITAL
22 CONSORTIUM GROUP CERTIFICATE FOR JULEEN HEWITT AND SHELDON
23 HEWITT. IT'S A MORTGAGE SATISFACTION PROGRAM WITH A PAY-OFF
24 OF \$375,722.34. AND THE HOUSE IS IN CORAL SPRINGS, FLORIDA.
25 DO YOU RECOGNIZE THE SIGNATURE AT THE BOTTOM?

1 A YES, SIR.

2 Q WHOSE IS IT?

3 A TIMOTHY MCQUEEN.

4 Q GOVERNMENT'S EXHIBIT 86C IS A SHIPPING RECEIPT. AND

5 AGAIN DO YOU SEE THAT THIS IS MADE TO SHELDON HEWITT. IT'S

6 SHIPPED FROM SHELDON HEWITT. CAN YOU SEE THAT?

7 A YES, SIR.

8 Q AND THEN IT'S BEING SHIPPED TO THE CAPITAL CONSORTIUM

9 GROUP; IS THAT RIGHT?

10 A YES, SIR.

11 Q AND THEY OBVIOUSLY PAID TO HAVE THAT SHIPPED; IS THAT

12 CORRECT?

13 A YES.

14 Q IT'S GOVERNMENT'S EXHIBIT 86C. THE DATE ON THAT, BY THE

15 WAY, DECEMBER 15TH OF 2006. SO WE GET TO THIS ONE,

16 DECEMBER 19TH OF 2006, GOVERNMENT'S EXHIBIT 86D AGAIN FROM

17 SHELDON HEWITT TO THE CAPITAL CONSORTIUM GROUP. AND THAT'S

18 THEIR MAILING ADDRESS; IS THAT CORRECT?

19 A YES, SIR.

20 Q OKAY. THAT WAS 86D. SHOWING YOU WHAT'S BEEN MARKED AS

21 GOVERNMENT'S EXHIBIT 87C. IT'S A FEBRUARY 14TH, 2005 CAPITAL

22 CONSORTIUM GROUP CERTIFICATE FOR FRANCIS ARCHER. DEPOSIT

23 AMOUNT OF \$30,000 WITH A 10 PERCENT RESIDUAL AT \$3,000 IS THE

24 RESIDUAL INCOME FOR LIFE PROGRAM. AND DO YOU RECOGNIZE THE

25 SIGNATURE AT THE BOTTOM?

1 A YES, SIR.

2 Q WHOSE IS IT?

3 A TIMOTHY MCQUEEN.

4 Q NOW, THIS CERTIFICATE MAY 24TH OF '06 TO MRS --

5 MR. FRANCIS ARCHER, DEPOSIT AMOUNT OF \$10,000 WITH A THOUSAND

6 DOLLARS RESIDUAL. IT IS A RESIDUAL INCOME FOR LIFE. DO YOU

7 RECOGNIZE THIS SIGNATURE AT THE BOTTOM OF 87D?

8 A YES, SIR.

9 Q WHOSE IS THIS SIGNATURE?

10 A JOSEPH BRUNSON.

11 Q DO YOU KNOW THIS COLON IN THE MIDDLE AND THE C

12 AFTERWARDS, DO YOU KNOW WHERE THAT COMES FROM?

13 A NO, SIR.

14 Q DO YOU SIGN YOUR NAME THAT WAY?

15 A NO.

16 Q SHOWING YOU GOVERNMENT'S EXHIBIT 87E, MAY 24TH OF; 06

17 AGAIN TO MR. ARCHER. ANOTHER RESIDUAL INCOME FOR LIFE.

18 WHOSE THE SIGNATORY ON THAT?

19 A JOSEPH BRUNSON.

20 Q SHOWING YOU GOVERNMENT'S EXHIBIT 87F IN MAY OF '06,

21 MORTGAGE SATISFACTION APPLICATION ON HIS BEHALF OR AT LEAST A

22 CERTIFICATE INDICATING HIS PARTICIPATION. DO YOU RECOGNIZE

23 THE SIGNATURE DOWN AT THE BOTTOM?

24 A YES, SIR.

25 Q WHOSE IS IT?

1 A JOSEPH BRUNSON.

2 Q AND THEN IT APPEARS AS THOUGH THERE ARE TWO LENDERS
3 BEING PAID OFF. ONE FOR ABOUT 120,000. THE OTHER FOR
4 65,000; IS THAT RIGHT?

5 A YES, SIR.

6 Q FOR A HOME IN MIAMI, FLORIDA?

7 A YES.

8 Q GOVERNMENT'S EXHIBIT 87G, A CAPITAL CONSORTIUM GROUP
9 CERTIFICATE AGAIN TO MR. ARCHER FOR THE AUTO SATISFACTION
10 PROGRAM. IT'S A 2006 BMW 325I WITH A BALANCE OF \$32,661.72.
11 AND WHO HAS SIGNED OFF ON THAT?

12 A JOSEPH BRUNSON.

13 Q SHOWING YOU WHAT'S BEEN MARKED AS GOVERNMENT'S
14 EXHIBIT 88C. IT'S A CAPITAL CONSORTIUM GROUP CERTIFICATE TO
15 EMORY DELONG WHO IS PARTICIPATING IN THE CCG LONG-TERM
16 PROGRAM, HAS DEPOSITED \$10,000 FOR A RESIDUAL OF A THOUSAND
17 DOLLARS MONTHLY. AND WHOSE SIGNATURE IS DOWN AT THE BOTTOM?

18 A TIMOTHY MCQUEEN.

19 Q SHOWING YOU NOW GOVERNMENT'S EXHIBIT 89C. THIS IS A
20 SEPTEMBER OF 2005 CERTIFICATE FOR SUSAN HILCHEY.
21 MRS. HILCHEY HAS DEPOSITED \$2,000 FOR A \$200 RESIDUAL INCOME
22 FOR LIFE. AND WHOSE SIGNATURE IS AT THE BOTTOM OF 89C?

23 A TONY POUGH.

24 Q NOW MA'AM, SHOWING YOU A FED-EX AIR BILL. LOOKING AT
25 THE RECIPIENT'S NAME THERE YOU SEE IT SAYS CAPITAL CONSORTIUM

1 GROUP AND IT'S GOT THE 1013 BROAD RIVER ROAD ADDRESS ON IT?

2 A YES, SIR.

3 Q AND THAT'S THE MAILING ADDRESS FOR THE CAPITAL
4 CONSORTIUM GROUP; IS THAT RIGHT?

5 A YES, SIR.

6 Q THAT'S GOVERNMENT'S EXHIBIT 89D. SHOWING YOU NOW WHAT'S
7 THE BEEN MARKED AS GOVERNMENT'S EXHIBIT 90C. IT'S A CAPITAL
8 CONSORTIUM GROUP CERTIFICATE TO MR. AND MRS. MICHAEL BENNETT
9 OF EDGEWOOD, MARYLAND. THEY'RE SIGNING UP FOR THE MORTGAGE
10 SATISFACTION PROGRAM WITH A SCHEDULED PAY-OFF OF NOVEMBER OF
11 2007, AND THE BALANCE IS GOING TO BE \$340,070.92. AND WHOSE
12 SIGNATURE IS THAT?

13 A TIMOTHY MCQUEEN.

14 Q SHOWING YOU GOVERNMENT'S EXHIBIT 91D, A CAPITAL
15 CONSORTIUM GROUP CERTIFICATE TO TERESA PETTY-FARRIS FOR THE
16 LONG-TERM PROGRAM. SHE'S PUT IN \$500 TO RECEIVE A \$50
17 RESIDUAL. AND WHOSE SIGNATURE IS AT THE BOTTOM?

18 A TIMOTHY MCQUEEN.

19 Q NOW SHOWING YOU GOVERNMENT'S EXHIBIT 91C. THIS IS
20 SHIPMENT TO TERESA PETTY FARRIS; IS THAT CORRECT?

21 A YES, SIR.

22 Q ADDRESS OF MILLINGTON, TENNESSEE; IS THAT RIGHT?

23 A YES, SIR.

24 Q AND THEN I DON'T KNOW IF YOU CAN MAKE IT OUT HERE, BUT
25 IT'S LEAVING FROM KMF 4039 MONTICELLO ROAD, COLUMBIA, SOUTH

1 CAROLINA. DO YOU SEE THAT?

2 A YES, SIR.

3 Q AND THAT WAS 97C -- I'M SORRY 91. SHOWING YOU NOW
4 WHAT'S BEEN MARKED AS GOVERNMENT'S EXHIBIT 92C, A CERTIFICATE
5 FROM THE CAPITAL CONSORTIUM GROUP FOR THOMAS ANTHONY MARTONE
6 IN MAY 14TH OF 2007. HE'S SIGNING UP FOR LONG-TERM PROGRAM,
7 HAS DEPOSITED \$30,000 FOR A \$3,000 MONTHLY RESIDUAL. DO YOU
8 RECOGNIZE THE SIGNATURE AT THE BOTTOM?

9 A YES, SIR.

10 Q WHOSE IS IT?

11 A TIMOTHY MCQUEEN.

12 Q IT'S GOVERNMENT'S EXHIBIT 92C. SHOWING YOU WHAT'S BEEN
13 MARKED AS GOVERNMENT'S EXHIBIT 93B. THAT'S A MAILING LABEL
14 SENT ON BEHALF OF KMF, AND THAT'S A LABEL THAT'S CONSISTENT
15 WITH THE ONES THAT YOU HAVE SEEN; IS THAT CORRECT?

16 A YES, SIR.

17 Q AND THAT'S TO MARY BRADLEY; IS THAT CORRECT?

18 A YES, SIR.

19 Q AND THERE'S THE POSTAGE UP HERE?

20 A YES.

21 Q SHOWING YOU A CERTIFICATE CAPITAL CONSORTIUM GROUP 93E.
22 MADE TO MARY BRADLEY FOR THE MORTGAGE SATISFACTION PROGRAM.
23 SHE'S GETTING A MORTGAGE PAID OFF OF \$192,554 AND CHANGE, AND
24 HER HOUSE APPEARS TO BE IN OXON HILL, MARYLAND. AND THE
25 SIGNATURE DO YOU RECOGNIZE?

1 A YES.

2 Q AND WHOSE SIGNATURE IS THAT?

3 A TIMOTHY MCQUEEN.

4 Q SHOWING YOU NOW WHAT'S BEEN MARKED AS EXHIBIT 93D. IT'S

5 A FED-EX AIR BILL BEING SENT FROM RONALD CROMARTIE IN

6 DANVILLE, VIRGINIA, AND IT'S BEING SENT TO THE CAPITAL

7 CONSORTIUM GROUP. AND DO YOU RECOGNIZE THE ADDRESS THERE?

8 A YES, SIR.

9 Q THAT'S GOVERNMENT'S EXHIBIT 93E. AND THAT'S THE CAPITAL
10 CONSORTIUM GROUP; IS THAT CORRECT?

11 A YES.

12 Q SHOWING YOU WHAT'S BEEN MARKED AS GOVERNMENT'S
13 EXHIBIT 94C. IT'S A CAPITAL CONSORTIUM GROUP CERTIFICATE
14 DATED MARCH 8TH OF 2007 MADE TO IRENE MCDOUGALD AND RONALD
15 MCDOUGALD. THEY LIVE IN FAYETTEVILLE, NORTH CAROLINA, AND
16 THEY ARE SEEKING TO HAVE A MORTGAGE PAID OFF OF \$30,481.91.
17 YOU SEE THE SIGNATURE AT THE BOTTOM?

18 A YES, SIR.

19 Q WHOSE IS IT?

20 A TIMOTHY MCQUEEN.

21 Q AND THIS IS A KMF MAILING LABEL THAT WE HAVE SEEN MANY
22 OF NOW AND YOU'RE FAMILIAR WITH THIS CCG; IS THAT CORRECT?

23 A YES, SIR.

24 Q THAT'S GOVERNMENT'S EXHIBIT 94B. YOU SEE THERE'S
25 POSTAGE THERE IN THE CORNER?

1 A YES.

2 Q SHOWING YOU GOVERNMENT'S EXHIBIT 95D. IT'S A CAPITAL
3 CONSORTIUM GROUP CERTIFICATE FOR JANET WARDEN. MRS. WARDEN
4 IS PARTICIPATING IN THE CCG LONG-TERM PROGRAM. SHE'S
5 CONTRIBUTED A THOUSAND DOLLARS WITH AN EXPECTATION OF A
6 HUNDRED DOLLARS MONTHLY. AND DO YOU RECOGNIZE THE SIGNATURE?

7 A YES, SIR.

8 Q AND WHOSE IS IT?

9 A TIMOTHY MCQUEEN.

10 Q AND AGAIN THAT'S FROM JANET WARDEN. AND THEN WE HAVE A
11 LABELING LABEL, GOVERNMENT'S EXHIBIT 95C, AND THAT'S BEING
12 MADE TO JANET WARDEN; IS THAT CORRECT?

13 A YES, SIR.

14 Q THAT'S A KMF LABEL ON BEHALF OF CCG; IS THAT RIGHT?

15 A YES.

16 Q FINALLY GOVERNMENT'S EXHIBIT 96. SHOWING YOU WHAT'S
17 BEEN MARKED AS GOVERNMENT'S EXHIBIT 96C. IT'S A
18 SEPTEMBER 2006 RESIDUAL INCOME FOR LIFE CERTIFICATE TO
19 WILLIAM AND KARLA PAYNE. THEY CONTRIBUTED \$10,000 FOR THE
20 EXPECTATION OF RECEIVING A THOUSAND DOLLARS A MONTH. WHO IS
21 IT SIGNED BY?

22 A TIMOTHY MCQUEEN.

23 Q NOW THANK YOU FOR YOUR PATIENCE, MS. GIBSON.

24 A YOU'RE WELCOME.

25 Q OKAY. YOU INDICATED BEFORE THAT YOU WORKED WITH CCG UP

1 UNTIL SEPTEMBER AND OCTOBER OF 2007.

2 A YES, SIR.

3 Q AND ABOUT THAT TIMEFRAME DID YOU MAKE A TRIP TO ATLANTA?

4 A YES.

5 Q AND WHAT WAS THE PURPOSE FOR YOU GOING OVER TO ATLANTA?

6 A TO GET INFORMATION TO FILE BANKRUPTCY.

7 Q AND WHAT KIND OF INFORMATION WERE YOU GETTING?

8 A CONSTITUENTS' NAMES FROM THEIR FILE -- FROM THEIR FILES.

9 Q AND WHERE HAD THOSE FILES BEEN STORED UP UNTIL MAYBE A
10 MONTH OR TWO BEFORE?

11 A IN COLUMBIA.

12 Q AND WHEN YOU TALK ABOUT GETTING CONSTITUENTS' NAMES OFF
13 OF FILES, HOW MANY BOXES OF FILES ARE WE TALKING ABOUT?

14 A MAYBE 50 I GUESS.

15 Q AND HOW BIG WERE THOSE FILE BOXES THAT YOU WERE CHECKING
16 FOR CONSTITUENTS' NAMES?

17 A PROBABLY ABOUT THAT LONG.

18 MR. HOLLIDAY: FOR THE RECORD, YOUR HONOR, SHE
19 APPEARS TO BE HOLDING HER HANDS ABOUT TWO AND A HALF FEET
20 APART.

21 BY MR. HOLLIDAY:

22 Q FAIR ENOUGH?

23 A YES, SIR.

24 Q WHO WAS IT THAT WENT WITH YOU OVER TO ATLANTA?

25 A THOMAS AL, JASSMINE, ASHLEY, DON, JAQUITA, KENDRA AND

1 DORIS, I BELIEVE.

2 Q SO IT WAS A GOOD BIT OF THE OFFICE STAFF; IS THAT RIGHT?

3 A YES, SIR.

4 Q NOW, YOU TOLD ME BEFORE THAT YOU WORKED ON THE THIRD
5 FLOOR; IS THAT RIGHT?

6 A YES, SIR.

7 Q AND YOU STORED CONSTITUENT FILES ON THE THIRD FLOOR; IS
8 THAT CORRECT?

9 A YES, SIR.

10 Q HOW MANY FILE CABINETS ARE WE TALKING ABOUT UP THERE AND
11 WHAT WAS THE SIZE OF THOSE FILE CABINETS?

12 A MAYBE ABOUT 10 TO 12 FILE CABINETS. THEY WERE PROBABLY
13 MAYBE ABOUT 5 FEET TALL, FIVE TO 6 FEET TALL.

14 Q SO THERE WERE A LOT OF RECORDS?

15 A YES, SIR.

16 Q NOW, WE HAVE TALKED, TOO ABOUT SOME OF THE OFFICES WHERE
17 YOU WORKED. THERE WAS AN OFFICE ON MONTICELLO ROAD?

18 A YES.

19 Q THERE WAS A HOUSE UP IN THE NORTHEAST?

20 A YES.

21 Q AND THERE WAS A PLACE ON HORSESHOE AS WELL?

22 A YES, SIR.

23 Q IN THE TIME THAT YOU WORKED FOR CCG THE OPERATIONS WERE
24 BASED IN COLUMBIA; ISN'T THAT RIGHT?

25 A YES, SIR.

1 Q DID YOU KNOW OF ANY HEADQUARTERS OPERATIONS OF CCG IN
2 ATLANTA?

3 A NOT TO MY KNOWLEDGE.

4 Q AND WHEN WAS IT -- YOU WENT IN SEPTEMBER OF 2007. WHEN
5 WAS IT THAT ALL THOSE RECORDS GOT SHIPPED FROM COLUMBIA TO
6 ATLANTA?

7 A I DON'T KNOW EXACTLY WHEN THEY WERE SHIPPED.

8 Q A MONTH OR TWO BEFORE?

9 A POSSIBLY A MONTH OR TWO BEFORE, YES, SIR.

10 Q HOW LONG WERE YOU OVER IN ATLANTA?

11 A FOR A DAY, OVERNIGHT.

12 Q AND YOU HAD ALL THESE FILE BOXES AND YOU SAID BEFORE YOU
13 WERE GATHERING INFORMATION FOR A BANKRUPTCY FILING OR
14 WHATEVER. SPECIFICALLY WHAT WERE YOU DOING WITH THE FILE
15 BOXES? WHAT KIND OF INFORMATION WERE YOU PULLING?

16 A NAMES OF THE CONSTITUENTS AND WHAT PROGRAM THEY WERE IN.

17 Q AND PHYSICALLY WERE YOU IN AN OFFICE BUILDING OR WHERE
18 WERE YOU DOING THIS?

19 A IN A HOTEL ROOM.

20 Q NOW, DID YOU HAVE LIKE A HOTEL CONFERENCE ROOM WITH, YOU
21 KNOW, CCG ON THE OUTSIDE OR SOMETHING LIKE THAT? WHAT KIND
22 OF HOTEL ROOM WERE YOU IN?

23 A NO, SIR, JUST A REGULAR HOTEL ROOM.

24 Q LIKE WITH A BED IN THERE?

25 A YES.

1 Q AND A DESK AND ALL THAT?

2 A YES, SIR.

3 Q AND WHO WAS IN CHARGE OF WHAT WAS GOING ON OVER IN
4 ATLANTA?

5 A ERNEST HESTER WAS THERE.

6 Q AND WHO IS ERNEST HESTER?

7 A HE'S A REP.

8 Q AN INDEPENDENT REPRESENTATIVE?

9 A YES, SIR.

10 Q DO YOU KNOW WHAT HAPPENED TO THOSE RECORDS OF
11 CONSTITUENTS AND THOSE 50 BOXES AFTER YOU LEFT ATLANTA?

12 A NO, SIR.

13 Q DID THEY COME BACK TO COLUMBIA?

14 A I'M NOT SURE. NOT TO MY KNOWLEDGE. I...

15 Q YOU HAVE ANY IDEA WHERE THEY ARE?

16 A NO, SIR.

17 Q NOW, YOU LEFT THERE IN OCTOBER OF 2007. YOU EVER TAKE A
18 TRIP WITH THE THREE HEBREW BOYS?

19 A YES, SIR.

20 Q OKAY. TELL ME WHEN THAT TRIP WAS. DO YOU REMEMBER?

21 A WE TOOK A TRIP TO ATLANTA AND THEN THERE WAS A CRUISE,
22 BUT THE HEBREW BOYS DIDN'T ATTEND THE CRUISE.

23 Q HOW MANY PEOPLE FROM CCG WENT ON THAT CRUISE?

24 A I WOULD ESTIMATE MAYBE BETWEEN 50 AND 70, BUT I'M NOT
25 INCLUDING THEIR FAMILIES.

1 Q SO THEIR FAMILIES WENT AS WELL?

2 A YES, SIR.

3 Q DID YOU HAVE TO PAY FOR YOUR CRUISE TICKET?

4 A NO, SIR.

5 Q WHO PAID FOR IT?

6 A I WOULD ASSUME CCG PAID FOR IT.

7 Q AND HOW ABOUT ALL THE OTHER FOLKS, DO YOU KNOW WHO PAID
8 FOR THEIRS?

9 A I COULD ONLY ASSUME IT WAS CCG. I'M NOT SURE WHO PAID
10 FOR THEIRS.

11 Q AND THIS WAS A CRUISE. DO YOU REMEMBER WHEN THAT CRUISE
12 WAS?

13 A JULY OF 2007 I BELIEVE.

14 Q SO THAT WAS JUST A LITTLE BIT BEFORE--

15 A 2000...

16 Q WAS IT RIGHT BEFORE YOU WENT OVER TO ATLANTA AND -- TO
17 DEAL WITH THOSE BOXES?

18 A YES, SIR.

19 Q BUT IT WAS AFTER CCG HAD BEEN SHUT DOWN BY THE
20 GOVERNMENT; IS THAT CORRECT?

21 A I -- I DON'T RECALL.

22 Q OKAY. ALL RIGHT. PLEASE ANSWER ANY QUESTIONS --

23 MR. HOLLIDAY: EXCUSE ME, YOUR HONOR. A MOMENT,
24 PLEASE.

25 (PAUSE.)

1 BY MR. HOLLIDAY:

2 Q NOW, AS FAR AS THE CRUISE THAT YOU WENT ON, DID YOU
3 RECOGNIZE SOME OF THE PEOPLE THAT WERE ON THE CRUISE WITH
4 YOU?

5 A YES.

6 Q AND WERE THEY -- DID THEY HAVE A ROLE IN THE COMPANY?
7 WERE THEY IRS?

8 A YES, THEY WERE IRS. THEY WERE REPS, YES, SIR.

9 Q OKAY. NOW, YOU MENTIONED THAT ERNEST HESTER WAS
10 OVERSEEING THIS ACTIVITY THAT WAS GOING ON IN ATLANTA; IS
11 THAT RIGHT?

12 A YES, SIR.

13 Q DO YOU KNOW IF HE'S RELATED TO ANY OF THE THREE HEBREW
14 BOYS?

15 A I THINK HE'S RELATED TO TONY POUGH IF I'M NOT MISTAKEN.

16 Q AND WHAT'S THE RELATIONSHIP THERE?

17 A BROTHER-IN-LAW I BELIEVE.

18 Q OKAY. AND THEN WE WENT THROUGH A LOT OF MAILINGS THERE
19 WITH THE -- WITH THE ENVELOPES AND ALL OF THAT. WAS IT THE
20 NORMAL COURSE THAT YOU WOULD RECEIVE PEOPLE'S CERTIFICATES OR
21 SEND OUT PEOPLE'S CERTIFICATES THROUGH THE MAIL WHILE YOU
22 WERE WORKING AT CCG?

23 A YES, SIR.

24 Q AND THEN THE CHECKS THAT WOULD BE COMING IN, WOULD THE
25 CHECKS TYPICALLY BE SENT BY PRIVATE COURIER ALSO BY THE MAIL?

1 A EITHER OR.

2 Q AND THEN FINALLY WERE YOU PRESENT AT THE CCG OFFICES IN
3 JUNE OF 2007 WHEN SLED CAME IN AND DID A SEARCH?

4 A YES.

5 Q OKAY.

6 A YES, I WAS PRESENT.

7 Q AND THOSE RECORDS THAT WERE OVER IN ATLANTA THAT YOU
8 LATER TRAVELED TO SEE, WERE THEY IN THE OFFICES WHEN SLED
9 CAME THROUGH?

10 A I DON'T THINK SO. NO, SIR.

11 Q PLEASE ANSWER ANY QUESTIONS THE DEFENDANTS MIGHT HAVE
12 FOR YOU.

13 A SURE.

14 CROSS-EXAMINATION

15 BY MR. LANG:

16 Q MS. GIBSON, GOOD AFTERNOON. MY NAME IS LOUIS LANG. I
17 REPRESENT TIM MCQUEEN. JUST A COUPLE QUESTIONS, MS. GIBSON.
18 TELL ME AGAIN WHEN YOU WORKED FOR CCG, FROM WHEN TO WHEN?

19 A AUGUST 2006 UNTIL ABOUT AUGUST OR SEPTEMBER OF 2007.

20 Q OKAY. AND YOU WORKED FOR CCG WHEN IT WAS LOCATED OVER
21 AT -- ON HORSESHOE DRIVE; CORRECT?

22 A YES.

23 Q AND THAT WAS A THREE STORY BUILDING; CORRECT?

24 A YES, SIR.

25 Q AND YOU WORKED UP ON THE THIRD FLOOR; IS THAT RIGHT?

1 A THAT'S CORRECT.

2 Q NOW, THE SECOND FLOOR, CORRECT ME IF I'M WRONG, WAS
3 RENTED SPACE TO OTHER COMPANIES AND INDIVIDUALS; CORRECT?

4 A THAT'S CORRECT.

5 Q AND YOU HAD A FELLOW BY THE NAME OF RODDEY EDGISTER,
6 BETHEL CONSTRUCTION WAS LOCATED ON THAT SECOND FLOOR?

7 A YES, SIR.

8 Q AND THERE WAS ANOTHER REAL ESTATE COMPANY ON THAT SECOND
9 FLOOR?

10 A YES, SIR.

11 Q AND BETHEL CONSTRUCTION WAS A CONSTRUCTION COMPANY; WAS
12 IT NOT?

13 A THAT'S CORRECT.

14 Q AND IN FACT, THEY DID SOME OF THE WORK ON HORSESHOE
15 DRIVE; ISN'T THAT RIGHT?

16 A YES, SIR.

17 Q ALL RIGHT. IN TERMS OF -- I KNOW GOVERNMENT COUNSEL
18 ASKED YOU ABOUT THIS CRUISE. YOU DON'T KNOW WHEN -- I MEAN,
19 YOU ASSUME CCG PAID YOUR TICKET; IS THAT RIGHT?

20 A YES, SIR.

21 Q BUT YOU DON'T KNOW WHEN THEY DID THAT. I MEAN, THEY
22 COULD HAVE DONE THAT ANY TIME BEFORE YOU WENT; ISN'T THAT
23 RIGHT?

24 A THAT'S CORRECT.

25 Q COULD HAVE BEEN THE DAY BEFORE; CORRECT?

1 A THAT'S CORRECT.

2 Q COULD HAVE BEEN THE MONTH BEFORE; CORRECT?

3 A THAT'S CORRECT.

4 Q COULD HAVE BEEN FIVE MONTHS BEFORE; CORRECT?

5 A CORRECT.

6 Q COULD HAVE BEEN WAY BACK AT THE BEGINNING OF 2007;

7 CORRECT?

8 A YES, SIR.

9 Q ALL RIGHT. AND THAT GOES FOR -- AND YOU ASSUME THAT CCG
10 PAID FOR ALL THE OTHER PEOPLE TO BE THERE. YOU DON'T KNOW
11 WHEN THEY DID THAT; CORRECT?

12 A THAT'S CORRECT.

13 Q ALL RIGHT. DO YOU REMEMBER ANY OTHER TENANTS ON THAT
14 SECOND FLOOR OTHER THAN RODDY EDGISTER AND BETHEL
15 CONSTRUCTION AND THAT REAL ESTATE COMPANY?

16 A THAT'S ALL I CAN RECALL.

17 Q OKAY.

18 A I DON'T...

19 Q AND THEY WERE THERE THE WHOLE TIME YOU WERE THERE I TAKE
20 IT?

21 A YES, SIR. I DON'T KNOW IF THEY CAME -- YES, SIR. YES.
22 I DON'T KNOW IF THEY CAME BEFORE OR AFTER ME, BUT THEY WERE
23 THERE WHILE I WERE THERE.

24 Q OKAY.

25 MR. LANG: BEGGING THE COURT'S INDULGENCE FOR A

1 MINUTE.

2 (PAUSE.)

3 BY MR. LANG:

4 Q THANK YOU, MS. GIBSON. I HAVE NO FURTHER QUESTIONS.

5 A THANK YOU.

6 MR. SMALL: NOTHING.

7 MR. DUNCAN: I HAVE NO QUESTIONS.

8 MR. SMALL: NO QUESTIONS.

9 MR. HOLLIDAY: NO REDIRECT, YOUR HONOR.

10 THE COURT: OKAY. THANK YOU. YOU CAN STEP DOWN.
11 YOU'RE EXCUSED.

12 THE WITNESS: THANK YOU.

13 (WITNESS LEFT THE STAND.)

14 ***

15 I CERTIFY THAT THE FOREGOING IS A CORRECT TRANSCRIPT
16 FROM THE RECORD OF PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

17

18

19 ----- DECEMBER 21, 2009

20 S/KATHLEEN RICHARDSON, RPR, CRR

21

22

23

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25